

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re: : Chapter 11
:
ZEN JV, LLC, *et al.*,¹ : Case No. 25-11195 (JKS)
:
Debtors. : (Jointly Administered)
:
----- x **Objection Deadline: November 10, 2025 at 4:00 p.m. (ET)**

**THIRD MONTHLY APPLICATION OF RICHARDS, LAYTON & FINGER, P.A.
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
AND FOR REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE
DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD FROM
SEPTEMBER 1, 2025 THROUGH SEPTEMBER 30, 2025**

Name of Applicant:	<u>Richards, Layton & Finger, P.A.</u>
Authorized to Provide Professional Services to:	<u>the above-captioned debtors and debtors in possession</u>
Date of Retention:	<u>August 1, 2025 <i>nunc pro tunc</i> to June 24, 2025</u>
Period for which compensation and reimbursement are sought:	<u>September 1 through September 30, 2025</u>
Amount of Compensation sought as actual, reasonable, and necessary:	<u>\$297,938.40 (80% of \$372,423.00)²</u>
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	<u>\$1,509.63</u>
This is a(n): <u>X</u> monthly <u> </u> interim <u> </u> final application	

¹ The Debtors in these cases, along with the last four digits of each debtor's federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors' address is 200 N LaSalle Street #900, Chicago, IL 60601.

² Certain fees and expenses included herein were incurred in a prior monthly period but, due to accounting processes, were not realized until the Compensation Period (as defined herein).

Prior Applications Filed:

Date Filed	Period Covered	Fees	Expenses
8/25/25	6/24/25 – 7/31/25	\$917,032.50	\$32,298.74
9/16/25	8/1/25 – 8/31/25	\$503,855.00	\$3,212.78

COMPENSATION BY PROFESSIONAL³
SEPTEMBER 1, 2025 THROUGH SEPTEMBER 30, 2025

Name of Professional Individual	Position, year assumed position, prior relevant experience, year of obtaining relevant license to practice	Hourly Billing Rate (including changes)	Total Hours Billed	Total Compensation
Daniel J. DeFranceschi	Joined firm as associate in 1990. Director in 2000. Member of DE Bar since 1989.	\$1,500.00	1.1	\$1,650.00
Tara J. Hoffner	Business Department. Joined firm as associate in 1996. Director in 2004. Member of DE Bar since 1996.	\$1,295.00	0.4	\$518.00
Mark A. Kurtz	Business Department. Joined firm as associate in 2004. Director in 2015. Member of DE Bar since 2005.	\$1,150.00	0.3	\$345.00
Zachary I. Shapiro	Joined firm as associate in 2007. Director in 2019. Member of DE Bar since 2008.	\$1,175.00	103.5	\$121,612.50
Cory D. Kandestin	Joined firm as associate in 2007. Counsel in 2015. Director in 2024. Member of DE Bar since 2007.	\$1,175.00	1.6	\$1,880.00
Robert C. Maddox	Joined firm as associate in 2009. Counsel in 2021. Member of DE Bar since 2009.	\$1,000.00	20.1	\$20,100.00
Frank Y. Sun	Business Department. Joined firm as associate in 2017. Member of DE Bar since 2017.	\$900.00	0.2	\$180.00
Huiqi Vicky Liu	Joined firm as associate in 2020. Member of DE Bar since 2022.	\$800.00	112.4	\$89,920.00

³ All professionals are members of the firm's Corporate Restructuring and Bankruptcy Department unless otherwise noted.

Name of Professional Individual	Position, year assumed position, prior relevant experience, year of obtaining relevant license to practice	Hourly Billing Rate (including changes)	Total Hours Billed	Total Compensation
Clint M. Carlisle	Joined firm as associate in 2025. Member of NY Bar since 2021. Member of DE Bar since 2024.	\$800.00	120.2	\$96,160.00
Colin A. Meehan	Joined firm as associate in 2024. Member of DE Bar since 2023.	\$650.00	34.7	\$22,555.00
Katherine R. Strauch	Joined firm as associate in 2025.	\$575.00	0.8	\$460.00
Barbara J. Witters	Paralegal since 2000. Joined firm in 2000.	\$425.00	0.5	\$212.50
Rebecca V. Speaker	Paralegal since 2002. Joined firm in 2001.	\$425.00	24.8	\$10,540.00
Erin N. Weyl	Paralegal since 2021. Joined firm in 2024.	\$425.00	7.0	\$2,975.00
Tesia S. Smith	Case management assistant since 2016. Joined firm in 1996.	\$325.00	0.9	\$292.50
Jeanne T. Kolb	Case management assistant since 2023. Joined firm in 2015.	\$325.00	9.3	\$3,022.50
TOTAL			437.8	\$372,423.00

Grand Total	\$372,423.00
Attorney Compensation	\$355,380.50
Total Attorney Hours	395.3
Blended Rate	\$899.01

COMPENSATION BY PROJECT CATEGORY
SEPTEMBER 1, 2025 THROUGH SEPTEMBER 30, 2025

Project Category	Total Hours	Total Fees
Case Administration (A)	8.1	\$6,577.50
Creditor Inquiries (B)	0.2	\$160.00
Meetings (C)	12.6	\$9,770.00
Executory Contracts/Unexpired Leases (D)	24.2	\$21,010.00
Automatic Stay/Adequate Protection (E)	2.2	\$1,760.00
Plan of Reorganization/Disclosure Statement (F)	202.1	\$181,248.00
Use, Sale, Lease of Assets (G)	0.8	\$652.50
Cash Collateral/DIP Financing (H)	1.4	\$1,645.00
Claims Administration (I)	59.2	\$48,275.00
Court Hearings (J)	17.4	\$14,562.50
General Corporate/Real Estate (K)	0.2	\$160.00
Schedules/SOFA/U.S. Trustee Reports (L)	7.5	\$5,775.00
Employee Issues (M)	2.4	\$2,820.00
Environmental (N)	0.0	\$0.00
Tax Issues (O)	0.6	\$405.00
Litigation/Adversary Proceedings (P)	34.1	\$35,090.00
RL&F Retention (Q-1)	0.0	\$0.00
Retention of Others (Q-2)	15.2	\$11,612.50
RL&F Fee Applications (R-1)	35.7	\$20,455.00
Fee Applications of Others (R-2)	13.5	\$10,012.50
Vendor/Supplies (S)	0.3	\$352.50
Non-Working Travel (T)	0.0	\$0.00
Utilities (U)	0.0	\$0.00
Insurance (V)	0.1	\$80.00
TOTAL	437.8	\$372,423.00

EXPENSE SUMMARY
SEPTEMBER 1, 2025 THROUGH SEPTEMBER 30, 2025

Expense Category	Service Provider (if applicable)	Total Expenses
Facsimile		\$0.00
Conference Calling		\$0.00
Long Distance Telephone		\$0.00
In-House Reproduction (Duplication/Printing)	Duplicating: 0 @ \$.10 pg. Printing: 667 pages @ \$.10 pg.	\$66.70
Outside Reproduction	Parcels	\$662.85
Legal Research	Bloomberg	\$254.80
Filing/Court Fees		\$0.00
Court Reporting	Reliable	\$191.40
Travel Expenses		\$0.00
Inside Courier & Expense Carriers		\$0.00
Outside Courier & Expense Carriers	Blue Marble	\$123.00
Postage		\$0.00
Binding		\$0.00
Business Meals	<i>See attached chart</i>	\$54.48
Document Retrieval	Pacer	\$156.40
RL&F Service Corp		\$0.00
Professional Services		\$0.00
Overtime		\$0.00
Room Rental		\$0.00
Equipment Rental		\$0.00
Stationery Supplies		\$0.00
TOTAL		\$1,509.63

BUSINESS MEAL DETAIL				
Date	Provider	Meal & Number of people	Description	Amount
9/3/25	Albie's Burger	Lunch for 2	Preparation for 7/8/25 Hearing	\$36.00
9/3/25	Starbucks	Coffee for 2	Preparation for 7/28/25 Hearing	\$18.48
TOTAL				\$54.48

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FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
ZEN JV, LLC, <i>et al.</i> , ¹	:	Case No. 25-11195 (JKS)
Debtors.	:	(Jointly Administered)
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	x	Objection Deadline: November 10, 2025 at 4:00 p.m. (ET)

**THIRD MONTHLY APPLICATION OF RICHARDS, LAYTON & FINGER, P.A.
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED
AND FOR REIMBURSEMENT OF EXPENSES AS CO-COUNSEL TO THE
DEBTORS AND DEBTORS IN POSSESSION FOR THE PERIOD FROM
SEPTEMBER 1, 2025 THROUGH SEPTEMBER 30, 2025**

Pursuant to Sections 330 and 331 of title 11 of the United States Code, §§ 101-1532 (the “Bankruptcy Code”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), rule 2016-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and the *Order Pursuant to 11 U.S.C. §§ 331, 330, and 105(a) and Fed. R. Bankr. P. 2016 (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (II) Granting Related Relief* [Docket No. 258] (the “Interim Compensation Order”), Richards, Layton & Finger, P.A. (“RL&F”) hereby files this *Third Monthly Application of Richards, Layton & Finger, P.A. for Allowance of Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel to the Debtors and Debtors in Possession for the Period from September 1, 2025 through September 30, 2025* (the “Application”). By the Application, RL&F seeks a monthly allowance pursuant to the Interim

¹ The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Lucco Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

Compensation Order with respect to the sums of \$372,423.00 (80% of which equals \$297,938.40), as compensation and \$1,509.63 for reimbursement of actual and necessary expenses, for a total of \$373,932.63 for the period September 1, 2025 through and including September 30, 2025 (the “**Compensation Period**”). In support of this Application, RL&F respectfully represents as follows:

Background

1. On June 24, 2025 (the “**Petition Date**”), the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) each filed a voluntary petition with this Court for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to manage and operate their businesses as debtors in possession under sections 1107 and 1108 of the Bankruptcy Code. An official committee of unsecured creditors (the “**Creditors’ Committee**”) was appointed in these chapter 11 cases on July 2, 2025 [Docket No. 65].

2. RL&F was retained as co-counsel to the Debtors, effective as of the Petition Date, pursuant to the *Order Authorizing Retention and Employment of Richards, Layton & Finger, P.A. as Co-Counsel to the Debtors and Debtors in Possession Effective as of Petition Date*, entered on August 1, 2025 [Docket No. 264] (the “**Retention Order**”). The Retention Order authorized RL&F to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

3. On October 7, 2025, this Court entered an order [Docket No. 429] (the “**Confirmation Order**”) confirming the *Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Liquidation* (the “**Plan**”), which was attached to the Confirmation Order as **Exhibit A** thereto. On October 14, 2025, the effective date of the Plan occurred. See Docket No. 458.

Compensation Paid and its Source

4. All services for which compensation is requested by RL&F were performed for or on behalf of the Debtors.

5. Except to the extent of the retainer paid to RL&F as described in the application seeking approval of RL&F's employment by the Debtors, during the period covered by this Application, RL&F has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between RL&F and any other person other than the directors of RL&F for the sharing of compensation to be received for services rendered in these cases.

Fee Statement

6. The fee statement for the Compensation Period is attached hereto as **Exhibit A**. This statement contains daily time logs describing the time spent by each attorney and paraprofessional for the Compensation Period. To the best of RL&F's knowledge, this Application complies with Sections 330 and 331 of the Bankruptcy Code, the applicable Bankruptcy Rules, the Guidelines adopted by the Office of the United States Trustee, Local Rule 2016-1, and the Interim Compensation Order.

Actual and Necessary Expenses

7. A summary of actual and necessary expenses and daily logs of expenses incurred by RL&F during the Compensation Period is attached hereto as **Exhibit B**. RL&F charges all of its bankruptcy clients \$0.10 per page for photocopying expenses and \$0.10 per page for printing jobs.

8. Regarding providers of on-line legal research (*e.g.*, WESTLAW), RL&F charges all of its clients the standard usage rates these providers charge, which, due to contractual flat fees, may not always equal RL&F's actual cost. RL&F currently is under contract to pay these providers a flat fee every month. Charging its clients the on-line providers' standard usage rates allows RL&F to cover adequately the monthly flat fees it must pay to these types of providers.

9. RL&F believes the foregoing rates are the market rates that the majority of law firms charge clients for such services. In addition, RL&F believes that such charges are in accordance with the American Bar Association's ("ABA") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

Summary of Services Rendered

10. The directors and associates of RL&F who have rendered professional services in these cases are as follows: Daniel J. DeFranceschi, Tara J. Hoffner, Mark A. Kurtz, Zachary I. Shapiro, Cory D. Kandestin, Robert C. Maddox, Frank Y. Sun, Huiqi Vicky Liu, Clint M. Carlisle, Colin A. Meehan and Katherine R. Strauch. The paraprofessionals of RL&F who have provided services to these attorneys in these cases are as follows: Barbara J. Witters, Rebecca V. Speaker, Erin N. Weyl, Tesia S. Smith and Jeanne T. Kolb.

11. RL&F, by and through the above-named persons, has prepared and/or assisted in the preparation of various applications and orders submitted to the Court for consideration, advised the Debtors on a regular basis with respect to various matters in connection with these cases and has performed all necessary professional services, which are described and narrated in detail hereinafter.

Summary of Services By Project

12. The services rendered by RL&F during the Compensation Period can be grouped into the categories set forth below. These categories are generally described below, with a more detailed identification of the actual services provided set forth on the attached **Exhibit A**. The attorneys and paraprofessionals who rendered services relating to each category are identified, along with the number of hours for each individual and the total compensation sought for each category, in **Exhibit A** attached hereto.

A. **Case Administration/Miscellaneous Matters**

Fees: \$6,577.50 Total Hours: 8.1

This category includes all matters related to filing documents with the Court, service thereof, maintenance of calendars, communications with the United States Trustee (the **“U.S. Trustee”**), review of work in process reports, review of notices of appearance and maintaining service lists.

B. **Creditor Inquiries**

Fees: \$160.00 Total Hours: 0.2

This category includes all matters related to responding to creditor inquiries.

C. **Meetings**

Fees: \$9,770.00 Total Hours: 12.6

This category includes all matters related to preparing for and attending meetings with the Debtors, the Creditors’ Committee, individual creditors, the U.S. Trustee, co-counsel and the Debtors’ other professionals.

D. Executory Contracts/Unexpired Leases

Fees: \$21,010.00 Total Hours: 24.2

This category includes all matters related to contract and lease analysis and matters related to assumption, assignment or rejection of executory contracts and unexpired leases.

E. Automatic Stay/Adequate Protection

Fees: \$1,760.00 Total Hours: 2.2

This category includes all matters related to and including all motions related to modification of the automatic stay, the effect of the automatic stay or pending matters, and all other types of actions where adequate protection is the central issue.

F. Plan of Reorganization/Disclosure Statement

Fees: \$181,248.00 Total Hours: 202.1

This category includes all matters related to review, formulation, negotiation, preparation and promulgation of plans of reorganization, disclosure statements, and related corporate documentation and research relating thereto.

G. Use, Sale, Lease of Assets

Fees: \$652.50 Total Hours: 0.8

This category includes all matters relating to acquisitions, dispositions and other postpetition uses of property of the estate.

H. Cash Collateral/DIP Financing

Fees: \$1,645.00 Total Hours: 1.4

This category includes all matters relating to negotiation and documentation of debtor in possession financing and post-confirmation financing, all cash collateral issues and related pleadings.

I. Claims Administration

Fees: \$48,275.00 Total Hours: 59.2

This category includes all matters related to and including claims administration and bar date matters, including claims objections and related contested matters.

J. Court Hearings

Fees: \$14,562.50 Total Hours: 17.4

This category includes all matters related to preparation for and attendance at court hearings.

K. General Corporate/Real Estate

Fees: \$160.00 Total Hours: 0.2

This category includes all matters relating to transactional, corporate governance and related matters involving the Debtors' business operations that are not part of a plan of reorganization or disclosure statement.

L. Schedules/SOFA/U.S. Trustee Reports

Fees: \$5,775.00 Total Hours: 7.5

This category includes preparation of schedules and amendments, statements of financial affairs and amendments, operating reports and other reports required by the U.S. Trustee or the Court.

M. Employee Issues

Fees: \$2,820.00 Total Hours: 2.4

This category includes all matters related to employee wages, benefits, collective bargaining issues, other employee relations matters, ERISA, and retirement benefits.

N. Environmental

Fees: \$0.00 Total Hours: 0.0

This category includes all environmental matters, other than environmental aspects of the plan of reorganization.

O. Tax Issues

Fees: \$405.00 Total Hours: 0.6

This category includes all federal and state income, property, employment, excise and other tax matters, other than the tax aspects of the plan of reorganization.

P. Litigation/Adversary Proceedings

Fees: \$35,090.00 Total Hours: 34.1

This category includes all matters related to litigation and adversary proceedings.

Q-1. RL&F Applications

Fees: \$0.00 Total Hours: 0.0

This category includes all matters related to preparing applications to retain RL&F and supplements thereto.

Q-2. Retention of Others

Fees: \$11,612.50 Total Hours: 15.2

This category includes time spent reviewing applications for retention of other professionals, objecting to the retention of other professionals and assisting other professionals with preparing and filing retention applications.

R-1. RL&F Fee Applications

Fees: \$20,455.00 Total Hours: 35.7

This category includes all time spent preparing, reviewing, filing and circulating monthly invoices and fee applications for RL&F.

R-2. Fee Applications of Others

Fees: \$10,012.50 Total Hours: 13.5

This category includes time spent reviewing invoices or applications of other professionals, objecting to fees of other professionals and assisting other professionals with filing and circulating monthly invoices and applications.

S. Vendor/Suppliers

Fees: \$352.50 Total Hours: 0.3

This category includes all matters related to vendors and suppliers, including reclamation issues.

T. Non-Working Travel

Fees: \$0.00 Total Hours: 0.0

This category includes all travel time not otherwise chargeable.

U. Utilities

Fees: \$0.00 Total Hours: 0.0

This category includes all matters related to utility issues.

V. Insurance

Fees: \$80.00 Total Hours: 0.1

This category includes all matters related to insurance policies or coverage.

Valuation of Services

13. Attorneys and paraprofessionals of RL&F have expended a total of 437.8 hours in connection with this matter during the Compensation Period, as follows:

<u>ATTORNEYS</u>	<u>HOURS</u>	<u>HOURLY RATE</u>
Daniel J. DeFranceschi	1.1	\$1,500.00
Tara J. Hoffner	0.4	\$1,295.00
Mark A. Kurtz	0.3	\$1,150.00
Zachary I. Shapiro	103.5	\$1,175.00
Cory D. Kandestin	1.6	\$1,175.00
Robert C. Maddox	20.1	\$1,000.00
Frank Y. Sun	0.2	\$900.00
Huiqi Vicky Liu	112.4	\$800.00
Clint M. Carlisle	120.2	\$800.00
Colin A. Meehan	34.7	\$650.00
Katherine R. Strauch	0.8	\$575.00
<u>PARAPROFESSIONALS</u>	<u>HOURS</u>	<u>HOURLY RATE</u>
Barbara J. Witters	0.5	\$425.00
Rebecca V. Speaker	24.8	\$425.00
Erin N. Weyl	7.0	\$425.00
Tesia S. Smith	0.9	\$325.00
Jeanne T. Kolb	9.3	\$325.00

The nature of the work performed by these persons is fully set forth in **Exhibit A** attached hereto.

These are RL&F's normal hourly rates for work of this character. The reasonable value of the services rendered by RL&F to the Debtors during the Compensation Period is \$372,423.00.

14. In accordance with the factors enumerated in Section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by RL&F is fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered,

(d) the value of such services, and (e) the costs of comparable services other than in a case under this title. Moreover, RL&F has reviewed the requirements of Local Rule 2016-1 and believes that this Application complies with that Local Rule.

WHEREFORE, RL&F respectfully requests that the Court authorize that for the Compensation Period, an allowance be made to RL&F pursuant to the terms of the Interim Compensation Order, with respect to the sum of \$372,423.00 as compensation for necessary professional services rendered (80% of which equals \$297,938.40), and the sum of \$1,509.63 as 100% reimbursement of actual necessary costs and expenses, for a total of \$373,932.63 and that such sums be authorized for payment and for such other and further relief as this Court may deem just and proper.

Dated: October 20, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ Zachary I. Shapiro
RICHARDS, LAYTON & FINGER, P.A.

Daniel J. DeFranceschi (No. 2732)
Zachary I. Shapiro (No. 5103)
Huiqi Liu (No. 6850)
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*Co-Counsel for the Debtors and
Debtors in Possession*

CERTIFICATION OF COMPLIANCE WITH DEL. BANKR. L.R. 2016-1

I, Zachary I. Shapiro, on the 20th day of October, 2025, certify as follows:

- a) I am a Director with the applicant firm, Richards, Layton & Finger, P.A., and have been admitted to appear before this Court.
- b) I have personally performed many of the legal services rendered by RL&F, as co-counsel to the Debtors, and am thoroughly familiar with the other work performed on behalf of the Debtors by the lawyers and other professionals of RL&F.
- c) I have reviewed the foregoing Application and the facts set forth therein are true and correct to the best of my knowledge, information and belief. Moreover, I have reviewed Local Rule 2016-1, and submit that the Application substantially complies with such rule.

/s/ Zachary I. Shapiro
Zachary I. Shapiro (No. 5103)